

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

JARROD STRINGER, <i>et. al.</i>	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
ROLANDO PABLOS, IN HIS OFFICIAL CAPACITY AS THE TEXAS SECRETARY OF STATE and STEVEN C. McCRAW, IN HIS OFFICIAL CAPACITY AS THE DIRECTOR OF THE TEXAS DEPARTMENT OF PUBLIC SAFETY	§	Civil Action No. 5:16-cv-00257-OLG
	§	
	§	
	§	
	§	
Defendants.	§	
	§	

PLAINTIFFS' NOTICE OF FILING PROPOSED FORM OF JUDGMENT

Plaintiffs file this Notice along with their Proposed Form of Judgment, which is submitted as Exhibit A. The Court's May 10, 2018 Order requires the Parties to submit a proposed form of judgment setting forth the necessary declaratory and injunctive relief, consistent with the Court's findings, on or before May 17, 2018. Order, Dkt. 105 at 60-61.

On May 14, 2018, Plaintiffs' counsel emailed their proposed form of judgment to Defendants' counsel. *See* Ex. A; Ex. B. On May 15, 2018, Plaintiffs' counsel requested a meeting with Defendants' counsel to discuss the proposed form of judgment. *See* Ex. C. Defendants' counsel agreed to confer via telephone call at 8:30 a.m. the next day. During the conference on May 16, 2018, Defendants' counsel notified Plaintiffs' counsel that they generally do not agree with the monitoring and public education provisions in Plaintiffs' proposed form of judgment and recommended that the Parties submit separate filings in response to the Court's May 10th Order. During the call on May 16th and in an email sent on the morning of May 17, 2018, Plaintiffs' counsel requested that Defendants' counsel send a draft of Defendants'

proposed form of judgment—or specify Defendants’ objections to Plaintiffs’ proposed form of judgment and provide the details of Defendants’ proposal. *See* Ex. D. Defendants’ counsel did not respond to this email with specific objections to Plaintiffs’ proposed form of judgment or specific proposals from Defendants. Instead, Defendants’ counsel stated, in part, that Defendants “were unable to reconcile [Plaintiffs’] proposal with the requirement that injunctive relief be narrowly tailored to address the particular legal violation the Court found, as required by Rule 65.” *See* Ex. E.

As a result, if necessary, Plaintiffs request the Court allow them the opportunity to respond to Defendants’ proposed form of judgment, any specific objections made by Defendants to Plaintiffs’ proposed form of judgment, and/or any specific proposals from Defendants.

Dated: May 17, 2017

Respectfully submitted,

By: /s/ Hani Mirza
Peter A. Kraus (*pro hac vice*)
Texas Bar No. 11712980
kraus@waterskraus.com
Charles S. Siegel
Texas Bar No. 18341875
siegel@waterskraus.com
Caitlyn E. Silhan
Texas Bar No. 24072879
csilhan@waterskraus.com
Rachel A. Gross (*pro hac vice*)
Texas Bar No. 24073608
rgross@waterskraus.com

WATERS & KRAUS, LLP
3141 Hood Street, Suite 700
Dallas, Texas 75219
214-357-6244 (Telephone)
214-871-2263 (Facsimile)

Mimi M.D. Marziani
Texas Bar No. 24091906
mimi@texascivilrightsproject.org
Rebecca Harrison Stevens
Texas Bar No. 24065381

beth@texascivilrightsproject.org
Hani Mirza
Texas Bar No. 24083512
hani@texascivilrightsproject.org

TEXAS CIVIL RIGHTS PROJECT
1405 Montopolis Drive
Austin, Texas 78741
512-474-5073 (Telephone)
512-474-0726 (Facsimile)

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2018, a true and correct copy of this Notice and Plaintiffs' Proposed Form of Judgment was served upon counsel of record via the Court's ECF system.

/s/ Hani Mirza

CERTIFICATE OF CONFERENCE

I hereby certify that on May 16 and 17, 2018, Plaintiffs' counsel conferred with Defendants' counsel, Anna Mackin and Esteban Soto, and Defendants' counsel are opposed to Plaintiffs' Proposed Form of Judgment, which is submitted with this Notice as Exhibit A.

/s/ Hani Mirza